

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ING LIFE INSURANCE AND ANNUITY
COMPANY

Plaintiff,

v.

KUMBIRAI CHIWARA USHE,

FIDES PERDITA USHE AS MOTHER
AND NATURAL GUARDIAN OF
KUMBIRAI CHIWARA USHE,

ZVIDZAI G. USHE,

DUMAZILE Z. USHE,

NTOMBIZODWA KUMALO-USHE
(LAST SPOUSE OF SAMSON CHIWARA
USHE), individually and as Administratrix
of the ESTATE OF SAMSON CHIWARA
USHE

Defendants.

CIVIL ACTION NO. 1:04-11571-KPN

FILING FEE PAID:

RECEIPT # 305981
AMOUNT \$ 50.00
BY DPTY CLK WCH
DATE 6/27/05

**MOTION FOR ADMISSION
PRO HAC VICE OF MELICENT B. THOMPSON**

ING Life Insurance and Annuity Company ("ING"), hereby moves, by and through its designated local counsel, Gabriel D.M. Ciociola, pursuant to Local Rule 83.5.3, for an order permitting Melicent B. Thompson, Esquire to appear on behalf of ING. The grounds for this motion are set forth in the affidavit of Melicent B. Thompson, Esquire, submitted herewith.

1. Ms. Thompson is a member in good standing of the bars of the State of Connecticut and the State of Georgia, duly admitted to practice in the State of

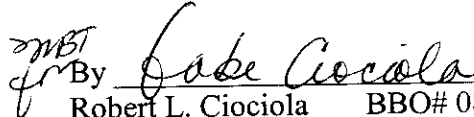
Connecticut and the State of Georgia, and the United States District Courts for the District of Connecticut and the District of Georgia.

2. Ms. Thompson has not been denied admission nor disciplined by either this or any other Court, and has no disciplinary proceedings pending against her in any jurisdiction where she has been admitted to practice.
3. Gabriel D. M. Ciociola is a member in good standing of this Court, has entered an appearance in this case, and will continue as local counsel for ING in this case.

WHEREFORE, ING respectfully requests that Ms. Thompson be permitted to appear on its behalf in this case.


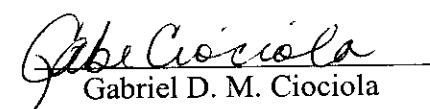
Dated: June 23, 2005

Respectfully submitted,
Interpleader Plaintiff,
ING Life Ins. & Annuity Co.

By 
Robert L. Ciociola BBO# 084140
Gabriel D. M. Ciociola BBO# 636072
Litchfield Cavo, LLP
6 Kimball Lane, Suite 100
Lynnfield, MA 01940
(781) 309-1500
(781) 309 0167 Fax
Its Attorneys

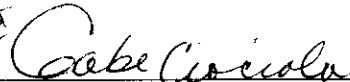
CERTIFICATE : LOCAL RULE 7.1(A)(2)

I hereby certify that I have conferred with counsel and with unrepresented parties of record in this action concerning the above motion, and have verified that none have an opposition.

 
Gabriel D. M. Ciociola

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon all counsel of record or unrepresented parties by first class mail, postage pre-paid on June 23, 2005.

for 

Gabriel D. M. Ciociola

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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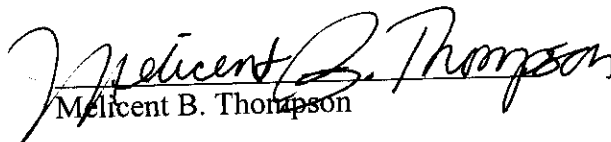
AFFIDAVIT OF MELICENT B. THOMPSON

MELICENT B. THOMPSON, having been duly sworn, hereby deposes and says
as follows:

1. I am a graduate of University of Connecticut School of Law and I am an associate with the law firm of Litchfield Cavo, LLP, 40 Tower Lane, Suite 200, Avon, Connecticut, which represents ING Life Insurance and Annuity Company ("ING"). I seek permission to practice before this Court for the purposes of appearing on behalf of ING during the course of the proceedings in this case.

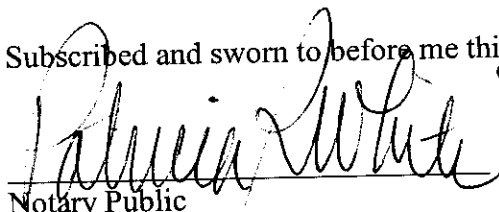
2. I was admitted to practice in the State of Connecticut in 1999, and I am and always have been a member in good standing of the Bar of the State of Connecticut. My attorney registration number in Connecticut is 417006. I was also admitted to practice in the State of Georgia in 1996, and am and always have been a member in good standing in the State of Georgia. My attorney registration number in Georgia is 709143. I am also admitted to practice in the United States District Court for the Districts of Connecticut and Georgia.
3. I am a member in good standing of every jurisdiction where I have been admitted to practice and there are no disciplinary proceedings against me as a member of the bar in any jurisdiction. I am not currently, nor have I ever been, held in contempt of court, or censured, suspended or disbarred by any court.
4. I have read, and am familiar with, the Rules of the United States District Court for the District of Massachusetts.
5. I am not a resident of the Commonwealth of Massachusetts, nor am I regularly employed in the Commonwealth of Massachusetts, nor am I regularly engaged in substantial business, professional or other activities within the Commonwealth of Massachusetts.
6. Designated local counsel for ING in this action, Gabriel D. M. Ciociola, Esquire, of Litchfield Cavo, LLP, 6 Kimball Lane, Lynnfield, Massachusetts, is a member in good standing of this Court, has entered an appearance in this action, and my application for leave to practice in this Court is on his motion.
7. I agree to practice under the supervision of ING's designated local counsel, who is a member in good standing of the Bar of the Commonwealth of Massachusetts.

8. ING has requested that I participate as counsel during this action, together with Marc Edrich, Esquire, of Litchfield Cavo, LLP, under the supervision of ING's designated local counsel.
9. I aver that there is good cause for my admission *pro hac vice*, as designated local counsel is located near Boston, from where this action was transferred, and cannot practicably attend proceedings in the transfer venue of Springfield.


Melicent B. Thompson

State of Connecticut

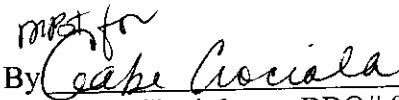
Subscribed and sworn to before me this 3rd day of June 2005.


Notary Public

My commission expires:

PATRICIA R. WHITE
NOTARY PUBLIC
MY COMMISSION EXPIRES JULY 31, 2007
TE
MAY 31, 2007

Respectfully submitted,
Interpleader Plaintiff,
ING Life Ins. & Annuity Co.

By 
Robert L. Ciociola BBO# 084140
Gabriel D. M. Ciociola BBO# 636072
Litchfield Cavo, LLP
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(781) 309-1500
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Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon all counsel of record or unrepresented parties by first class mail, postage pre-paid on June 15, 2005.

msb
for Gabe Ciociola
Gabriel D. M. Ciociola